

1 Leon F. Mead II, Esq.  
Nevada Bar No. 5719  
2 eMail: leon@meadlawgroup.com  
3 Sarah Mead Thomas, Esq.  
Nevada Bar No. 13725  
4 eMail: sarah@meadlawgroup.com  
**MEAD LAW GROUP**  
5 10161 Park Run Drive, Suite 150  
6 Las Vegas, NV 89145  
Tel: 702.745-4800  
7 Fax: 702.745.4805

8 *Attorneys for Defendants*  
9 Thomas Contracting & Development, LLC  
dba TCD Construction and Thomas Devlin

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

13 Hanover Insurance Company, a New  
Hampshire corporation

14 Plaintiff,

15 vs.

17 Thomas Contracting & Development, LLC  
18 dba TCD Construction, a Nevada limited  
19 liability company; Thomas Devlin, an  
20 individual; Does 1 through 100; and Roe  
Corporations 1 through 100, inclusive,

21 Defendants.

Case No.: 2:18-cv-2279-MMD-CWH

**STIPULATION AND PROPOSED  
ORDER TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

**[FIRST REQUEST]**

22 Plaintiff Hanover Insurance Company, by and through its counsel of record,  
23 Ellsworth & Bennion, Chtd. and Jennings, Strouss & Salmon, P.L.C., and Defendants  
24 Thomas Contracting & Development, LLC dba TCD Construction and Thomas Devlin,  
25 by and through their counsel of record, Mead Law Group, do hereby agree that the time  
26 for Defendants to respond to Plaintiff's Complaint be extended to January 11, 2018.  
27 Good cause exists for this extension as it is the first extension requested and Defendants  
28 need time to search through their records in order to accurately respond to the Complaint  
in light of how long ago the factual circumstances alleged occurred.

1 It is so stipulated.

2  
3 Dated: January 8, 2018

Dated: January 8, 2018

4 JENNINGS, STROUSS & SALMON,  
5 P.L.C.

MEAD LAW GROUP

6 By: /s/ Patrick F. Welch  
7 Patrick F. Welch, Esq.  
8 Nevada Bar No. 13278  
9 One East Washington Street  
10 Phoenix, AZ 85004

By: /s/ Sarah M. Thomas  
Leon F. Mead II, Esq.  
Nevada Bar No. 5719  
Sarah Mead Thomas, Esq.  
Nevada Bar No. 13725  
10161 Park Run Drive, Suite 150  
Las Vegas, NV 89145

Charles W. Bennion, Esq.  
Nevada Bar No. 5582  
Ellsworth & Bennion, Chtd.  
777 N Rainbow Blvd, Suite 270  
Las Vegas, NV 89107

*Attorneys for Defendants Thomas  
Contracting & Development, LLC dba  
TCD Construction and Thomas Devlin*

*Attorneys for Plaintiff Hanover Insurance  
Company*

15 **IT IS SO ORDERED.**

16  
17   
UNITED STATES MAGISTRATE JUDGE

18 DATED: January 9, 2019.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28